Case 4:23-mj-00057-N/A-JR Document 1 Filed 01/30/23 Page 1 of 2

CRIMINAL COMPLAINT (Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
V.	
Angela Escamilla; DOB: 2002; U.S. Citizen Janine Carmenila Rose Morales; DOB: 1998; U.S. Citizen	MAGISTRATE'S CASE NO.
Janine Carmenna Rose Hiorares, Dob. 1990, C.S. Chizon	23-00057MI

Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), & 1324(a)(1)(B)(i); 1325; 18 USC § 3

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT 1 (Felony) On or about January 28, 2023, in the District of Arizona, Angela Escamilla and Janine Carmenila Rose Morales, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, to include Gustavo Angel Perez-Cabrera and Elias Aquino-Hernandez, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

COUNT 2 (Misdemeanor) On or about January 28, 2023, in the District of Arizona, Angela Escamilla and Janine Carmenila Rose Morales, knowing that certain illegal aliens, to include Gustavo Angel Perez-Cabrera and Elias Aquino-Hernandez, had entered the United States at a time or place other than as designated by immigration officers, did knowingly assist them so that they would not be apprehended by law enforcement by harboring them and/or transporting them; in violation of Title 8, United States Code, Section 1325(a)(1) and Title 18 United States Code, Section 3.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On January 28, 2023, in the District of Arizona (Newfield), at approximately 1:00 a.m., Border Patrol Agents (BPAs) were notified of four suspected non-citizens who were observed walking north of the International Boundary Barrier (IBB) towards a vehicle located on Federal Route 19 (FR 19). Three subjects entered the vehicle, and the fourth returned south toward Mexico. BPAs located the vehicle, a white 2020 Buick Encore, and initiated a traffic stop. The vehicle yielded, and as BPAs parked, three individuals ran into the surrounding desert from the back passenger doors. A BPA approached the vehicle and the driver, identified as **Janine Carmenila Rose Morales** was instructed to turn the vehicle off and remove the keys from the ignition. The passenger, identified as **Angela Escamilla** and the driver, **Morales** were secured. BPAs apprehended two of the subjects who fled from the vehicle, Gustavo Angel Perez-Cabrera and Elias Aquino-Hernandez. Both were citizens of Mexico, illegally present in the United States.

Material witness Elias Aquino-Hernandez stated he is a citizen of Mexico, and his smuggling fees would cost him \$8,000 and he made an initial payment of 1,500 for mafia fees. He illegally crossed into the United States and was guided to the side of an unknown road where a white sedan picked them up. They boarded the vehicle, and he heard a female voice tell them to hide and to sit on the floor of the vehicle. The vehicle traveled approximately ten minutes until they were stopped by BPAs. Aquino-Hernandez stated that once the vehicle came to a complete stop they all fled. **Continued on next page.**

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Gustavo Angel Perez-Cabrera and Elias Aquino-Hernandez

Detention Requested
Being duly sworn, I declare that the foregoing is
true and correct to the best of my knowledge.

OFFICIAL TITLE & NAME:
U.S. Border Patrol Agent

Signature of Magistra and Elias Aquino-Hernandez

DATE
January 30, 2023

1) See Federal rules of Criminal Procedure Rules 3 and 54

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Material witness Gustavo Angel Perez-Cabrera stated he is from Mexico, and he paid \$1,000 up front and was expected to pay a total of \$7,500 to be smuggled into the United States. He illegally crossed into the United States in a group of three. The group walk about ten minutes before arriving to the location where they were to be picked up. The guide, who got away, in the group was the one who called for the vehicle to pick them up at their location. Perez-Cabrera stated a white sedan arrived at their location and the foot guide opened the door for him to enter the vehicle. The driver told the group to lie down in the back seat to avoid being seen from the outside Perez-Cabrera stated once the driver pulled over, they exited the vehicle to try to avoid apprehension.

After waiving her *Miranda* rights, **Escamilla** stated she knew **Morales** from work. **Escamilla** stated that **Morales** approached her about making money picking up people. She stated that the people were going to be illegal aliens. **Escamilla** stated she agreed to go with **Morales** to pick up the illegal aliens and she was going to receive half of the profits. **Escamilla** stated she was speaking with a subject through WhatsApp. He was going to pay \$1,000 for successful delivery of the illegal aliens to Phoenix, Arizona. They were told they would be picking up three illegal aliens. She picked up **Morales** in her car, and they were instructed to drive to Sells, Arizona and wait for further instructions. They drove to a pin drop location and people ran from the remote desert and entered the car. **Escamilla** stated that once the illegal aliens were in the car, they drove off. Shortly after, they were being pulled over by law enforcement.

After waiving her *Miranda* rights, **Morales** stated she saw and advertisement on Snapchat for making money picking up people. She was aware that the advertisement was for picking up illegal aliens for money. She needed money to pay bills and decided to respond to the advertisement. **Morales** stated a subject responded to her and instructed her to message them through WhatsApp. She communicated with this subject, and they offered her \$1,000 per person. She was going to give half of the profit to **Escamilla**. She went to a pin drop and people ran from out of the remote desert toward her vehicle and got in. **Morales** stated that all the people who entered her vehicle were wearing camouflage clothing. She stated that she drove off after picking up the people and about three minutes later, she saw law enforcement lights activated behind her. The illegal aliens in the vehicle were yelling at her in Spanish, to unlock the doors, so they could get out. She unlocked the doors the illegal aliens ran away from the vehicle and law enforcement.